IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; DR. ANDREA WESLEY; DR. JOSEPH WESLEY; ROBERT EVANS; GARY FREDERICKS; PAMELA HAMNER; BARBARA FINN; OTHO BARNES; SHIRLINDA ROBERTSON; SANDRA SMITH; DEBORAH HULITT; RODESTA TUMBLIN; DR. KIA JONES; MARCELEAN ARRINGTON; VICTORIA ROBERTSON.

Plaintiffs,

VS.

STATE BOARD OF ELECTION COMMISSIONERS; TATE REEVES, in his official capacity as Governor of Mississippi; LYNN FITCH, in her official capacity as Attorney General of Mississippi; MICHAEL WATSON, in his official capacity as Secretary of State of Mississippi,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE COMMITTEE,

Intervenor-Defendant.

CIVIL ACTION NO. 3:22-cv-734-DPJ-HSO-LHS

PLAINTIFFS' UNOPPOSED MOTION TO REDACT THE TRIAL TRANSCRIPTS

Plaintiffs Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Marcelean Arrington, and Victoria Robertson move for this Court to permit redaction of certain information from the trial transcripts filed in the above-captioned

case, specifically the home addresses of the testifying Plaintiffs and witnesses at the following citations:

Document # of Transcript	Page	Line(s)	Proposed Redaction Requested
022724_NAACP_V2	232	21	I live in Okolona, [REDACTED].
022824_NAACP_V3	564	19	[REDACTED], Hattiesburg, Mississippi.
022824_NAACP_V3	685	14	[REDACTED]
022824_NAACP_V3	711-712	711:25 – 712:4	Okay, so I live right at [REDACTED], which is that street right there, and I live probably off of [REDACTED], which it's named [REDACTED] for all the churches, probably about right there. Give or take some, but I can't but that's probably where I live, at [REDACTED].
030124_NAACP_V5	918	15-16	[REDACTED], Ridgeland, Mississippi [REDACTED].
030124_NAACP_V5	919	15-16	[REDACTED], Ridgeland, Mississippi [REDACTED].
030124_NAACP_V5	918-919	918:25 – 919:1	My current address is [REDACTED], Jackson, Mississippi [REDACTED].
030124_NAACP_V5	923	17-20	Well, as you can see, the blue area in this map is where Northpointe Village is actually listed off of Old Canton Road, as well as the area in the purple is where I currently live at [REDACTED].

030124_NAACP_V5 927	14-15	Where it's [REDACTED], is
		actually on the street to turn off
		of [REDACTED]

Plaintiffs request that home addresses be removed from the transcript because they are traditionally private information and have no bearing on the ultimate issues in the case.

Defendants have indicated that they do not oppose this Motion.

WHEREFORE, Plaintiffs respectfully request the Court grant this Motion and permit the above-mentioned redactions of the trial transcript.

This the 25th day of March, 2024.

s/Joshua Tom_

Joshua Tom, MSB 105392 jtom@aclu-ms.org
ACLU OF MISSISSIPPI
101 South Congress Street
Jackson, MS 39201
(601) 354-3408

Robert B. McDuff, MSB 2532 rbm@mcdufflaw.com MISSISSIPPI CENTER FOR JUSTICE 767 North Congress Street Jackson, MS 39202 (601) 969-0802

Carroll Rhodes, MSB 5314 Law Offices of Carroll Rhodes crhodes6@bellsouth.net PO Box 588 Hazlehurst, MS 39083 (601) 894-1464

John P. Lavelle, Jr.
MORGAN, LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103-2921
Telephone: +1.215.963.4824
Facsimile: +1.215.963.5001
john.lavelle@morganlewis.com

Drew C. Jordan
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave. NW
Washington, DC 20004-2541
Telephone: +1.202.739.5962
Facsimile: +1.202.739.3001
drew.jordan@morganlewis.com

Attorneys for Plaintiffs

Ari J. Savitzky
asavitzky@aclu.org
Ming Cheung
mcheung@aclu.org
Casey Smith
csmith@aclu.org
Garrett Muscatel
gmuscatel@aclu.org
ACLU FOUNDATION
125 Broad Street, 18th Floor
New York, New York 10004
(212) 549-2500

Ezra D. Rosenberg
erosenberg@lawyerscommittee.org
Jennifer Nwachukwu
jnwachukwu@lawyerscommittee.org
David Rollins-Boyd
drollins-boyd@lawyerscommittee.org
Javon Davis
jdavis@lawyerscommittee.org
LAWYERS' COMMITTEE FOR CIVIL RIGHTS
UNDER LAW
1500 K Street NW Suite 900
Washington, DC 20005
(202) 662-8600

CERTIFICATE OF SERVICE

I, Joshua Tom, do certify that on this day I caused to be served a true and correct copy of the foregoing by electronic mail to all counsel of record.

This the 25th of March, 2024.

s/Joshua Tom Joshua Tom